

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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|---------------------------------|---|-------------------------------|
| In re: | : | |
| | : | Chapter 13 |
| LYNDEL TOPPIN, | : | |
| | : | |
| Debtor. | : | Bankruptcy No. 18-13098 (MDC) |
| | : | |
| LYNDEL TOPPIN, | : | |
| | : | |
| Plaintiff, | : | |
| | : | |
| v. | : | Adv. Proc. No. 18-00137 (MDC) |
| | : | |
| JEWELL WILLIAMS, SHERIFF | : | |
| OF THE CITY OF PHILADELPHIA and | : | |
| ABDELDAYEM HASSAN a/k/a | : | |
| ABDELDYEM HASSAN, | : | |
| | : | |
| Defendants. | : | |

**STIPULATION TO EXTEND TIME FOR FILING OF PLAINTIFF’S OPPOSITION TO
DEFENDANT’S MOTION FOR SUMMARY JUDGMENT**

COME NOW Lyndel Toppin and Jewell Williams, Sheriff of the City of Philadelphia (collectively, the “Parties”), and hereby stipulate as follows: WHEREAS, On January 24, 2020, Lyndel Toppin (“Plaintiff”) filed a Motion to Extend Time to File a Response to Defendant’s Summary Judgment Motion (“Motion to Extend”);

WHEREAS, Jewell Williams, Sheriff of the City of Philadelphia, (the “Sheriff”) does not admit or consent to the averments set forth in the Motion to Extend regarding the purported reasons why an extension is necessary;

WHEREAS the Sheriff, however, does not oppose the request for an extension to February 5, 2020 for Plaintiff to file a response to the Motion for Summary Judgment;

NOW, THEREFORE, in consideration of the background set forth above, the Parties agree:

1. That Plaintiff's response to the Motion for Summary Judgment, will be filed and served no later than Wednesday, February 5, 2020; and

2. The Sheriff's reply brief in support of the Motion for Summary Judgment shall be filed and served no later than Friday, February 14, 2020.

IT IS SO STIPULATED.

Dated: January 28, 2020

/s/ Stephen M. Dunne
Stephen M. Dunne, Esquire

/s/ Predrag Filipovic
Predrag Filipovic, Esquire
Attorneys for Plaintiff

Dated: January 28, 2020

/s/ Megan N. Harper
Megan N. Harper, Esquire
Attorney for Defendant